

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

In re: Debtor(s) name(s) used by the debtor(s) in the last 8 years, including married, maiden, and trade):

Patrick Eugene Kling

Debtor 1

Wendy Marie Kling

Debtor 2

RoundPoint Mortgage Servicing Corporation

Movant(s)

v.

Patrick Eugene Kling

Wendy Marie Kling

Respondent(s)

Charles J. DeHart, III, Esquire

Standing Chapter 13 Trustee

Additional Respondent

Chapter 13

Case No. 1:20-BK-00762-HWV

Matter: Motion for Relief from the Automatic Stay

Document No. 27

**DEBTOR(S)' ANSWER TO MOVANT(S)' MOTION
FOR RELIEF FROM THE AUTOMATIC STAY**

AND NOW, come the Debtor(s), Patrick Eugene Kling and Wendy Marie Kling, through their attorney, Paul D. Murphy-Ahles, Esquire and DETHLEFS PYKOSH & MURPHY, who files the within Debtor(s)' Answer to Movant(s)' Motion for Relief from the Automatic Stay and aver as follows:

1. Admitted.

2. Admitted.

3. Admitted.

4. Admitted.

5. Admitted.

6. Denied. Debtor(s) have brought their account current by way of a payment in the amount of \$6,861.42

which was paid on October 6, 2020.

7. Denied. Debtor(s) have brought their account current by way of a payment in the amount of \$6,861.42

which was paid on October 6, 2020.

8. Paragraph 8 contains a conclusion of law to which no response is required.

9. Paragraph 9 contains a conclusion of law to which no response is required.

WHEREFORE, Debtor(s) requests this Court deny the requested relief.

Respectfully submitted,
DETHLEFS PYKOSH & MURPHY

Dated: October 7, 2020

/s/ Paul D. Murphy-Ahles

Paul D. Murphy-Ahles, Esquire
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Camp Hill, PA 17011
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Attorney for Debtor(s)

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CERTIFICATE OF SERVICE

I hereby certify that on Wednesday, October 7, 2020, I served a true and correct copy of the **Debtor(s)' Answer to Movant(s)' Motion for Relief from the Automatic Stay** in this proceeding via electronic means upon the following:

Rebecca Solarz, Esquire
KML Law Group, PC
BNY Mellon Independence Center
701 Market Street, Suite 5000
Philadelphia, PA 19106
Counsel for Movant(s)

Charles J. DeHart, III, Esquire
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036

Office of the United States Trustee
Ronald Reagan Federal Building
228 Walnut Street, Room 1190
Harrisburg, PA 17101

/s/ Kathryn S. Greene

Kathryn S. Greene, Pa.C.P., Paralegal for
Paul D. Murphy-Ahles, Esquire